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7 *Representing the United States of America*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 **United States of America,**

12 Plaintiff,

13 v.

14 **Zolotarev, et al.**

15 Defendants.

16 Case No. 2:12-cr-0004-APG-GWF

17 **Motion and Proposed Order**
18 **for Limited Unsealing**
19 **of Extradition Packet**

20 The United States of America, by and through its attorneys, DAYLE ELIE-
21 SON Acting United States Attorney, and KELLY PEARSON, Trial Attorney, moves
22 for entry of the proposed Order unsealing the Affidavit in Support of Request for
Extradition of Roy Ayad in the above-captioned matter for the limited purposes of
disseminating the Extradition Packet, to include both the Agent and Attorney affi-
davits and corresponding exhibits, to foreign and domestic law enforcement and

1 other government authorities in connection with requests to other countries for the
2 arrest and removal of the defendants to the United States.

3 In support of its motion, the Government states:

4 1. On or about January 12, 2012, a federal grand jury sitting in the District of
5 Nevada returned an Indictment charging 39 defendants with 62 counts to include
6 (Count One) Racketeering, in violation of Title 18, United States Code, Section
7 1962(c), (Count Two) Racketeering Conspiracy, in violation of Title 18, United States
8 Code, Section 1962(d); amongst other criminal charges.

9 2. The government is seeking the apprehension and removal to the United
10 States of: Roy Ayad, a.k.a. Rabie Ayad, and “Patistota”, who is believed to be located
11 outside the United States.

12 3. In April 24, 2018, the Court sealed the Affidavit in Support of Request for
13 Extradition of Roy Ayad, after it was sworn before this Court. The Affidavit included
14 an Agent and Attorney affidavit, along with corresponding exhibits.

15 4. The process of seeking arrest and removal of defendants located in other coun-
16 tries necessarily involves disclosure of the extradition documents and arrest war-
17 rants to domestic and foreign authorities, for example, the U.S. Department of Jus-
18 tice, Office of International Affairs and the U.S. Department of State, as well as var-
19 ious Ministries of Foreign Affairs.

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5. The United States, accordingly, moves this Court to unseal the Ayad Extradition Packet for the limited purposes of disseminating the Extradition Packet to foreign and domestic law enforcement and other government authorities in connection with request for extradition.

6. Accordingly, the Government respectfully requests entry of the attached proposed Order.

DATED this 25th day of April, 2018.

Respectfully submitted,

DAYLE ELIESON
United States Attorney

/ s / Kelly Pearson

KELLY PEARSON
Trial Attorney

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2 **UNITED STATES DISTRICT COURT**

3 **DISTRICT OF NEVADA**

4

5 **United States of America,**

6 Plaintiff,

7 v.

8 Defendants.

9

10 Case No. 2:12-cr-0004-APG-GWF

11 **Order on Limited Unsealing of Ex-**
12 **tradition Packet**

13

14 **Zolotarev, et al.**

15

16 Upon consideration and review of the Government's Motion for Limited Un-
17 sealing of the Extradition Packet:

18 IT IS HEREBY ORDERED that the Government's motion is granted and that
19 the Affidavit in Support of Request for Extradition of Roy Ayad is unsealed for the
20 limited purposes of disseminating the Extradition Packet to foreign and domestic
21 law enforcement and other government authorities in connection with the apprehen-
22 sion of defendant Ayad.

18 **DATED** this 25th day of April, 2018.

19 By the Court:

20 

21 _____
22 United States Magistrate Judge